

EXHIBIT 176

Camesheann Tabitha Wakefield

Page 1

- - -

JUUL LABS LITIGATION

- - -

January 20, 2022

- - -

REMOTE ORAL SWORN STATEMENT

of CAMESHEANN TABITHA WAKEFIELD (TABBY WAKES), conducted at the location of the witness in New York, New York, commencing at 2:18 p.m. EST, on the above date, before Marie Foley, a Registered Merit Reporter, Certified Realtime Reporter and Notary Public.

- - -

GOLKOW LITIGATION SERVICES

877.370.3377 ph | 917.591.5672 fax

deps@golkow.com

Camesheann Tabitha Wakefield

<p style="text-align: right;">Page 2</p> <p>1 ALL APPEARANCES VIA REMOTE ZOOM TECHNOLOGY:</p> <p>2</p> <p>3</p> <p>4 WAGSTAFF & CARTMELL LLP</p> <p>5 BY: LUCY R. DAVIS, ESQUIRE</p> <p>6 4740 Grand Avenue</p> <p>7 Suite 300</p> <p>8 Kansas City, Missouri 64112</p> <p>9 816.701.1100</p> <p>10 ldavis@wcllp.com</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 4</p> <p>1 - - -</p> <p>2 E X H I B I T S</p> <p>3 - - -</p> <p>4 NO. DESCRIPTION PAGE</p> <p>5 Exhibit 1 Printout from Tabby 8</p> <p>6 Wakes Instagram account</p> <p>7</p> <p>8 Exhibit 2 COACD digital flyer 11</p> <p>9</p> <p>10</p> <p>11 Exhibit 3 PowerPoint photographs 23</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p style="text-align: right;">Page 3</p> <p>1 - - -</p> <p>2 TRANSCRIPT INDEX</p> <p>3 PAGE</p> <p>4 APPEARANCES..... 2</p> <p>5 INDEX OF EXHIBITS..... 4</p> <p>6 STATEMENT OF CAMESHEANN TABITHA WAKEFIELD:</p> <p>7 BY: MS. DAVIS..... 6</p> <p>8 SIGNATURE PAGE..... 44</p> <p>9 ERRATA..... 45</p> <p>10 REPORTER'S CERTIFICATE..... 43</p> <p>11</p> <p>12</p> <p>13</p> <p>14 - - -</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 5</p> <p>1 - - -</p> <p>2 2:18 p.m. EST</p> <p>3 - - -</p> <p>4 THE STENOGRAPHER: All parties</p> <p>5 to this statement are appearing</p> <p>6 remotely and have agreed to the</p> <p>7 witness being sworn in remotely. Due</p> <p>8 to the nature of remote reporting,</p> <p>9 please pause briefly before speaking</p> <p>10 to ensure all parties are heard</p> <p>11 completely.</p> <p>12 MS. DAVIS: I'm Lucy Davis for</p> <p>13 plaintiff.</p> <p>14 Do we have the full name on the</p> <p>15 record here?</p> <p>16 THE WITNESS: Camesheann Tabitha</p> <p>17 Wakefield.</p> <p>18 THE STENOGRAPHER: Ms.</p> <p>19 Wakefield, if I could ask you to raise</p> <p>20 your right hand, please.</p> <p>21 CAMESHEANN TABITHA WAKEFIELD, having been</p> <p>22 first duly sworn by a Notary Public</p> <p>23 in and of the State of New York, was</p> <p>24 examined as follows:</p>

2 (Pages 2 to 5)

Camesheann Tabitha Wakefield

Page 6	Page 8
<p>1 EXAMINATION BY 2 MS. DAVIS: 3 Q. And you prefer to go by? 4 A. Tabby Wakes, yeah. 5 Q. So, we have a court reporter 6 here today who's going to be writing down 7 what we're saying. There's a couple of 8 rules that we need to go over for her 9 benefit. One is we need to try not to 10 talk over each other. It's human nature 11 to respond quickly, but I'll try to give 12 you enough room to finish your answer. 13 Try to give me enough room to finish my 14 question. Shouldn't be that hard. 15 Make sure your responses are 16 verbal. No uh-uh, mm-hm, because that's 17 really hard to type down. 18 If you don't understand a 19 question, feel free to tell me. I'll 20 rephrase it. I'm going to try my best to 21 make sure you understand every question 22 the first time, but feel free to tell me. 23 And if you need a break, let us 24 know. We can go off the record. You can</p>	<p>1 A. 2014. 2 Q. And what year did you leave 3 Stony Brook? 4 A. 2016. 2016. 5 Q. Okay. 6 A. Sorry. 7 Q. No worries. 8 And most of the events we're 9 talking about today are going to be back 10 in 2015. So how old were you in 2015? 11 A. 18. 12 Q. Ms. Wakes, you have a somewhat 13 large social media following; is that 14 correct? 15 A. Yeah. 16 Q. All right. 17 A. Yes. 18 MS. DAVIS: First I want to mark 19 Exhibit 1. 20 (Tabby Wakes Exhibit 1, printout 21 from Tabby Wakes Instagram account, 22 was marked for identification, as of 23 this date.) 24 MS. DAVIS: And why don't we</p>
Page 7	Page 9
<p>1 have a break for a drink, bathroom, 2 whatever you need. 3 A. Cool. 4 Q. Let's begin. 5 So, Tabby, how old are you? 6 A. How old am I now? 7 Q. Today. 8 A. 25. 9 Q. And what's your birth date? 10 A. June 19th, 1996. 11 Q. And where do you live? 12 A. In New York. 13 Q. That's New York City, New York? 14 A. Yes, New York City. 15 Q. And what do you do for a living? 16 A. I make music. 17 Q. And where did you go to school, 18 high school, college, beyond? 19 A. I went to New York City Lab 20 School for high school and middle school, 21 and I went to Stony Brook for college and 22 I left. 23 Q. And what year did you graduate 24 high school?</p>	<p>1 hold this up for the benefit of the 2 court reporter to the camera. 3 (Pause.) 4 BY MS. DAVIS: 5 Q. And it says here, this is the 6 top line of your Instagram; is that 7 correct? 8 A. Yes. 9 Q. And it says here that you have 10 12,300 followers; is that correct? 11 A. Yes. 12 Q. And did you have a significant 13 following in 2015, a large following? 14 A. Yeah, it was still a large 15 following. 16 Q. Going back to 2015, were you 17 invited to a June 4th, 2015 party at Jack 18 Studios, that was the launch party of 19 Juul? 20 A. Yes. 21 Q. Who invited you to the party? 22 A. I was invited to, kind of, 23 promote by COACD. 24 Q. And that would have been Douglas</p>

Camesheann Tabitha Wakefield

Page 10	Page 12
<p>1 Perrett who invited you?</p> <p>2 A. Yes.</p> <p>3 Q. He never represented you?</p> <p>4 A. No, he never represented me.</p> <p>5 Q. And how did you guys know each</p> <p>6 other?</p> <p>7 A. I would throw parties and one of</p> <p>8 my friends kind of just, like, introduced</p> <p>9 us, yeah.</p> <p>10 Q. How did he reach out to you?</p> <p>11 A. Well, he would -- some -- some</p> <p>12 of the parties he would come and cast it,</p> <p>13 but for this one he just hit me up and was</p> <p>14 like hey and, you know, invite some</p> <p>15 people.</p> <p>16 Q. You told me that you were</p> <p>17 invited to the party as kind of like a</p> <p>18 promoter?</p> <p>19 A. Yes.</p> <p>20 Q. So you were going to bring</p> <p>21 people? That was your job?</p> <p>22 A. Yeah, I had to make like a -- I</p> <p>23 had a RSVP list. I had people RSVP</p> <p>24 through me.</p>	<p>1 digital flyer, was marked for</p> <p>2 identification, as of this date.)</p> <p>3 MS. DAVIS: And if you'll hold</p> <p>4 that up for me real quick.</p> <p>5 (Pause.)</p> <p>6 BY MS. DAVIS:</p> <p>7 Q. So, this is what we call a</p> <p>8 digital flyer, right?</p> <p>9 A. Yes.</p> <p>10 Q. An invitation to the event; is</p> <p>11 that correct?</p> <p>12 A. Yeah.</p> <p>13 Q. And so, this is an invitation</p> <p>14 that you put out on your own social media</p> <p>15 about the event?</p> <p>16 A. Yeah.</p> <p>17 Q. Who gave you this flyer?</p> <p>18 A. COACD.</p> <p>19 Q. When you put it out on your</p> <p>20 social media, you had already invited</p> <p>21 people or got more people from the flyer?</p> <p>22 A. I put the -- when I put the</p> <p>23 flyer out, before that it was</p> <p>24 word-of-mouth and then I put the flyer out</p>
Page 11	Page 13
<p>1 Q. And how many would you say you</p> <p>2 invited, like ballpark?</p> <p>3 A. Probably, like, 50 people. But</p> <p>4 then, like, half of the people came, I</p> <p>5 think.</p> <p>6 Q. Okay.</p> <p>7 A. Yeah, it wasn't that big of a --</p> <p>8 it was like a small big party, if that</p> <p>9 makes sense.</p> <p>10 Q. Yeah, I understand what you're</p> <p>11 saying.</p> <p>12 So you, like, kind of reached</p> <p>13 into your own network to invite those 50?</p> <p>14 A. I probably invited more people.</p> <p>15 But, how do I explain this? 'Cause it's,</p> <p>16 like, a public post first. So, like, that</p> <p>17 in its own way just travels. So you don't</p> <p>18 really know how many people you actually,</p> <p>19 like, you know, like, outreach to by</p> <p>20 accident. It's cool.</p> <p>21 MS. DAVIS: And just so we can</p> <p>22 get clear on what we're talking about</p> <p>23 here, I'm going to mark Exhibit 2.</p> <p>24 (Tabby Wakes Exhibit 2, COACD</p>	<p>1 and then I was, like, it could have been</p> <p>2 on -- I don't know what day I put the</p> <p>3 flyer out, but it was just to, like, I</p> <p>4 think I had to get an RSVP list or just,</p> <p>5 like, people's names. I'm not sure.</p> <p>6 Q. Were you told, like did you kind</p> <p>7 of know that it was a casting party for</p> <p>8 this billboard campaign?</p> <p>9 A. No. I just knew this.</p> <p>10 Q. That's all you were told?</p> <p>11 A. Yeah, like June 4th and the</p> <p>12 address and stuff, which isn't even on</p> <p>13 here actually, so.</p> <p>14 Q. Okay.</p> <p>15 As a part of the people that you</p> <p>16 invited, and we'll go through some a lot</p> <p>17 in a minute, but you invited Mimi Sweeney</p> <p>18 to the party?</p> <p>19 A. Yeah.</p> <p>20 Q. Do you know how old she was at</p> <p>21 the time?</p> <p>22 A. 17.</p> <p>23 Q. And if she said she was invited</p> <p>24 by a friend who was in the Manhattan party</p>

Camesheann Tabitha Wakefield

Page 14	Page 16
<p>1 scene, that would have been you?</p> <p>2 A. Yeah.</p> <p>3 Q. Okay. Perfect.</p> <p>4 Because you were promoting and</p> <p>5 bringing in guests, were you paid for that</p> <p>6 work?</p> <p>7 A. Yes.</p> <p>8 Q. How much were you paid?</p> <p>9 A. I believe, like, \$200.</p> <p>10 Q. And do you remember in what</p> <p>11 form?</p> <p>12 A. Cash. 'Cause this is before</p> <p>13 Cash App and all that stuff.</p> <p>14 Q. Of course.</p> <p>15 A. Yeah.</p> <p>16 Q. And then do you remember who</p> <p>17 paid you?</p> <p>18 A. COACD.</p> <p>19 Q. Okay.</p> <p>20 A. I'm assuming they had, like, a</p> <p>21 budget probably.</p> <p>22 Q. And just for the record, you</p> <p>23 attended that launch party?</p> <p>24 A. Yes.</p>	<p>1 And I didn't have an ID that said I was</p> <p>2 over 21.</p> <p>3 Q. So you didn't have like a fake</p> <p>4 ID at the time?</p> <p>5 A. No.</p> <p>6 Q. So they would have either not</p> <p>7 checked your ID or checked it and known</p> <p>8 you were under 18 -- or, were 18?</p> <p>9 A. They didn't check my ID. And</p> <p>10 then they gave me -- and then they let me,</p> <p>11 yeah, they let me get my friends in too.</p> <p>12 Q. Do you know, because you said</p> <p>13 "they let me get my friends in," do you</p> <p>14 know if they checked your friends' IDs?</p> <p>15 A. I don't -- I don't think so.</p> <p>16 Q. You don't think so, okay.</p> <p>17 Once you entered the event, were</p> <p>18 you taken to, immediately come to a step</p> <p>19 and repeat area? Which to define for the</p> <p>20 record is a promotional background that</p> <p>21 would have the product on it to take</p> <p>22 photos in front of.</p> <p>23 A. I think that's what, like, right</p> <p>24 when you first walked in, I believe that</p>
Page 15	Page 17
<p>1 Q. Not only were you invited, you</p> <p>2 attended?</p> <p>3 A. Yeah, I also attended.</p> <p>4 Q. Okay.</p> <p>5 So, when you arrived at the</p> <p>6 event, did you go early, late, kind of in</p> <p>7 the middle?</p> <p>8 A. I went, like, earlier.</p> <p>9 Q. And did you go early because you</p> <p>10 felt like you were kind of working the</p> <p>11 event?</p> <p>12 A. Yeah, I felt like a little</p> <p>13 responsibility on making sure my guests</p> <p>14 were, like, okay.</p> <p>15 Q. Of course. You want to make</p> <p>16 sure --</p> <p>17 A. It's like a new environment.</p> <p>18 Q. When you arrived at the event,</p> <p>19 do you remember anyone checking your ID at</p> <p>20 the door?</p> <p>21 A. No.</p> <p>22 Q. So you have no specific memory</p> <p>23 of an ID check?</p> <p>24 A. No, I didn't get my ID checked.</p>	<p>1 was the first thing.</p> <p>2 Like a backdrop, you're saying?</p> <p>3 Q. Yeah.</p> <p>4 A. Yeah.</p> <p>5 Q. So, you showed up there</p> <p>6 immediately and photos were taken of you?</p> <p>7 A. Yeah.</p> <p>8 Q. In front of the Juul product</p> <p>9 image and logo that might have been on the</p> <p>10 background?</p> <p>11 A. Mm-hm.</p> <p>12 Or was it white background?</p> <p>13 It had -- it definitely had</p> <p>14 Juul's. Was it white? I can't remember.</p> <p>15 Q. Up to you.</p> <p>16 A. Yeah, it was -- there was a</p> <p>17 backdrop.</p> <p>18 Q. Were you given a welcome</p> <p>19 cocktail when you entered the event?</p> <p>20 A. Like I went to the bar and got a</p> <p>21 drink.</p> <p>22 Q. So you went to the bar and you</p> <p>23 got drinks from the bar?</p> <p>24 A. Yeah.</p>

Camesheann Tabitha Wakefield

Page 18	Page 20
<p>1 Q. Once again, you were not 21 at 2 the time? 3 A. No. 4 Q. And you did not have any sort of 5 ID that would have said your age was 21? 6 A. No. 7 Q. So the only ID you would have 8 had on you was one that would say 18? 9 A. Yeah. 10 Q. Thank you. 11 A. Sorry. 12 Q. Was that a cash bar, or was it 13 an open bar? 14 A. No, it was a open bar. 15 Q. And how many drinks did you 16 have? 17 A. Like the whole night? 18 Q. Yeah. 19 A. It was open bar. 20 Q. So, if we were to just take a 21 word to describe it, would you say a lot? 22 A. Five. 23 Q. Five? 24 A. Like a lot, yeah.</p>	<p>1 A. Yes. 2 Q. Again, your ID would have shown 3 that you were 18 years old at the time? 4 A. Yes. 5 Q. Okay. 6 A. My birthday was, like, in two 7 weeks or something. 8 Q. Okay. 9 A. From the 4th, yeah. To turn 19. 10 Q. Were you given any free samples 11 to take home with you from that? 12 A. Yes. 13 Q. Tell me about that. 14 A. There was just like a box and 15 you could just -- honestly, like towards 16 the -- I'm pretty sure, like, towards the 17 end too there's like this box filled with 18 them and you could take as many as you 19 want. 20 Q. Did you take as many as you 21 wanted, kind of, towards the end of the 22 party? 23 A. Like, during the party I had a 24 few, and then at the end, I kind of just,</p>
Page 19	Page 21
<p>1 Q. Okay. 2 A. 'Cause you could have beer and 3 they had cocktails. 4 Q. And do you remember whether you 5 drank beer or cocktails or both? 6 A. Both. 7 Q. Both? 8 A. Yeah. 9 Q. Okay. 10 And you went to the sampling 11 station? 12 A. Yeah. 13 Q. Which to define for the record, 14 the sampling station was an area at which 15 Juul was having party guests sample the 16 product; is that right? 17 A. Yes. 18 Q. Okay. 19 A. They had like the vape -- they 20 had like a fatter vape too. 21 Q. The older model? 22 A. Mm-hm. 23 Q. Were you able to sample that 24 product at the sampling station?</p>	<p>1 like, took a bunch 'cause I was just like 2 cool. 3 Q. So, after you got that amount of 4 product, did you have to buy Juul 5 afterwards? 6 A. No, I didn't have to buy Juul 7 for like a -- for like a year. 8 Q. Okay. 9 A. I had a lot of Juuls and pods. 10 Q. To your mind and memory, were 11 there any controls in place to prevent 12 people from taking a ton of product, or 13 were they encouraging it? 14 A. No. It was just -- they had, 15 like, the sampling bartenders. So they 16 were there, like, passing it out. 17 Q. Did your friends get free 18 samples? 19 A. Yeah, we all left with a bunch 20 of Juuls and pods. 21 Q. Because you were working the 22 event, did you talk to anybody who was 23 working on the Juul side or the party side 24 of the event? Were you, like, greeted or</p>

Camesheann Tabitha Wakefield

Page 22	Page 24
<p>1 thanked or anything like that?</p> <p>2 A. I believe so.</p> <p>3 Q. If you were, how would you</p> <p>4 remember those people? Like as executives</p> <p>5 of Juul or founders?</p> <p>6 A. Yeah, like founders.</p> <p>7 Q. Okay.</p> <p>8 A. I think they were founders.</p> <p>9 Just said hi.</p> <p>10 Q. And after that, you would</p> <p>11 have --</p> <p>12 A. Yeah, like it was just, like,</p> <p>13 I'm pretty sure, pretty sure, Douglas</p> <p>14 introduced them to me.</p> <p>15 Q. Just to --</p> <p>16 A. Just like hey, this is a cool</p> <p>17 girl. This is -- give me a Juul, yeah.</p> <p>18 Q. So they would have thanked you</p> <p>19 and then you would have gone back to your</p> <p>20 friends?</p> <p>21 A. Yeah. Like nice to meet you.</p> <p>22 Stuff like that.</p> <p>23 MS. DAVIS: Okay.</p> <p>24 I'm now marking a PowerPoint as</p>	<p>1 Q. And you invited him to the</p> <p>2 event?</p> <p>3 A. Yeah.</p> <p>4 Q. Then we're starting on the left</p> <p>5 side of the picture.</p> <p>6 Who is the girl wearing the</p> <p>7 black there at the left edge?</p> <p>8 A. Zoë Nochlin.</p> <p>9 Q. And how old is she?</p> <p>10 A. Between 18 and 19.</p> <p>11 Q. And you invited her to the</p> <p>12 event?</p> <p>13 A. Yes.</p> <p>14 Q. To her right, who was that?</p> <p>15 A. Down?</p> <p>16 Q. No, to her immediate right on</p> <p>17 that same row.</p> <p>18 A. That's me.</p> <p>19 Q. And to your right with the pink</p> <p>20 hair, who is that?</p> <p>21 A. Tallulah Gilroy.</p> <p>22 Q. And how old is she?</p> <p>23 A. Birthday's in December. So</p> <p>24 she's 18.</p>
Page 23	Page 25
<p>1 Exhibit 3.</p> <p>2 (Tabby Wakes Exhibit 3,</p> <p>3 PowerPoint photographs, was marked for</p> <p>4 identification, as of this date.)</p> <p>5 MS. DAVIS: I'm going to try to</p> <p>6 go through this as smoothly as we can.</p> <p>7 So I'm going to hold this up for</p> <p>8 the benefit of our court reporter.</p> <p>9 (Pause.)</p> <p>10 BY MS. DAVIS:</p> <p>11 Q. If you want to turn to the first</p> <p>12 page, what I'm going to have you do here</p> <p>13 is give me, kind of, the name, the age, if</p> <p>14 you remember, and tell me if you invited</p> <p>15 the people in the photo.</p> <p>16 So, I'm going to, kind of, guide</p> <p>17 you through here. So we're going to start</p> <p>18 in the back and work our way forward. So</p> <p>19 go ahead and look at it.</p> <p>20 In the back, do you know who</p> <p>21 that is holding the beer?</p> <p>22 A. Sam Bouiss.</p> <p>23 Q. And do you know how old he is?</p> <p>24 A. Between 18 and 19.</p>	<p>1 Q. And did you invite her to the</p> <p>2 event?</p> <p>3 A. Yeah.</p> <p>4 Q. And to her right, that is?</p> <p>5 A. Tarik Smith.</p> <p>6 Q. And how old is he?</p> <p>7 A. Between 20 and 21.</p> <p>8 Q. And did you invite him to the</p> <p>9 event?</p> <p>10 A. Yes.</p> <p>11 Q. Bottom row left side, who is</p> <p>12 that?</p> <p>13 A. Tino Tsanos.</p> <p>14 Q. Okay.</p> <p>15 A. This one (indicating)?</p> <p>16 Oh, no. Him. Sorry.</p> <p>17 Q. Green hat.</p> <p>18 A. Yeah. Nick Delgado.</p> <p>19 Q. And how old is he?</p> <p>20 A. Between 19 and 21.</p> <p>21 Q. And did you invite him to the</p> <p>22 event?</p> <p>23 A. Yes.</p> <p>24 Q. Last one, white hat?</p>

Camesheann Tabitha Wakefield

Page 26	Page 28
<p>1 A. Tino.</p> <p>2 Q. That's Tino?</p> <p>3 A. Yeah, Tino Tsanos.</p> <p>4 Q. How old is he?</p> <p>5 A. Between 18 and 19.</p> <p>6 Q. And did you invite him to the</p> <p>7 event?</p> <p>8 A. Yes.</p> <p>9 Q. Next page, who is that?</p> <p>10 A. Me.</p> <p>11 Q. Okay. Perfect.</p> <p>12 A. With one of the big vapes.</p> <p>13 Q. One more page over.</p> <p>14 A. Okay.</p> <p>15 Q. You've already identified</p> <p>16 everyone in this photo, so just going to</p> <p>17 take you from left to right real quick.</p> <p>18 On the far left was Sam?</p> <p>19 A. Yeah.</p> <p>20 Q. Next to him?</p> <p>21 A. Tallulah.</p> <p>22 Q. Next to her?</p> <p>23 A. Tino.</p> <p>24 Q. Next to him?</p>	<p>1 Q. How old was he?</p> <p>2 A. Between 20 and 21.</p> <p>3 Q. And did you invite him to the</p> <p>4 event?</p> <p>5 A. Yes.</p> <p>6 Q. Next to him?</p> <p>7 A. Danielle.</p> <p>8 Q. And how old was she?</p> <p>9 A. Between 20 and 21.</p> <p>10 Q. And did you invite her to the</p> <p>11 event?</p> <p>12 A. Yes.</p> <p>13 Q. And next to her?</p> <p>14 A. Tarik.</p> <p>15 Q. Who we've already gone through.</p> <p>16 A. Yeah.</p> <p>17 Q. And next to him is you?</p> <p>18 A. Yes.</p> <p>19 Q. Slide 7 now. We've primarily</p> <p>20 identified everyone in this photo, so</p> <p>21 we're going to go, kind of, top to bottom</p> <p>22 here.</p> <p>23 So in the very back that is?</p> <p>24 A. Nick Delgado.</p>
Page 27	Page 29
<p>1 A. Nick.</p> <p>2 Q. Next to him?</p> <p>3 A. Me.</p> <p>4 Q. Next to you?</p> <p>5 A. Zoë.</p> <p>6 Q. On the next page, the far left,</p> <p>7 the top row?</p> <p>8 A. Me.</p> <p>9 Q. Next to you?</p> <p>10 A. Julius Kani Biggs.</p> <p>11 Q. And how old is he?</p> <p>12 A. Between 18 and 19.</p> <p>13 Q. Did you invite him to the event?</p> <p>14 A. Yes.</p> <p>15 Q. Bottom row here, who is this?</p> <p>16 A. Alyssa Bourne-Peters.</p> <p>17 Q. How old is she?</p> <p>18 A. Between 18 and 19.</p> <p>19 Q. Did you invite her to the event?</p> <p>20 A. Yes.</p> <p>21 Q. Now we're on slide 6 now.</p> <p>22 A. Oh, there was two backdrops.</p> <p>23 Q. Again left to right.</p> <p>24 A. Christopher Topper.</p>	<p>1 Q. And then on the left of the</p> <p>2 second row down?</p> <p>3 A. Tino.</p> <p>4 Q. And then next to him?</p> <p>5 A. Me.</p> <p>6 Q. One more row down?</p> <p>7 A. Tallulah.</p> <p>8 Q. To her right is?</p> <p>9 A. Zoë.</p> <p>10 Q. And then bottom of the photo?</p> <p>11 A. Allie Shields Weber.</p> <p>12 Q. And Allie Shields Weber, how old</p> <p>13 is she?</p> <p>14 A. Between 18 and 19.</p> <p>15 Q. And did you invite her to the</p> <p>16 event?</p> <p>17 A. Yes.</p> <p>18 Q. So we're passing slide 8. We</p> <p>19 are moving on to slide 9.</p> <p>20 If you can hold that up for the</p> <p>21 court reporter.</p> <p>22 (Pause.)</p> <p>23 Q. All right.</p> <p>24 Kind of this back row?</p>

Camesheann Tabitha Wakefield

Page 30	Page 32
<p>1 A. Me.</p> <p>2 Q. And then?</p> <p>3 A. Nick Delgado.</p> <p>4 Q. And then bottom left?</p> <p>5 A. Tino.</p> <p>6 Q. And then bottom right?</p> <p>7 A. Frank Perdomo.</p> <p>8 Q. And how old was he?</p> <p>9 A. Between 16 and 17.</p> <p>10 Q. And did you invite him to the</p> <p>11 event?</p> <p>12 A. Yes.</p> <p>13 Q. The next slide here, slide 10.</p> <p>14 Hold that up for the court reporter,</p> <p>15 please.</p> <p>16 (Pause.)</p> <p>17 Q. Okay.</p> <p>18 On the left here we have?</p> <p>19 A. Lucy Borden.</p> <p>20 Q. And how old was she?</p> <p>21 A. Between 17 and 19.</p> <p>22 Q. And did you invite her to the</p> <p>23 event?</p> <p>24 A. No, 17 and 18. Sorry.</p>	<p>1 Q. And then next to you?</p> <p>2 A. William Daniels.</p> <p>3 Q. And how old is he?</p> <p>4 A. June -- between 18 and 19.</p> <p>5 Q. And did you invite him to the</p> <p>6 event?</p> <p>7 A. Yes.</p> <p>8 Q. And next to him?</p> <p>9 A. Jamie Wu.</p> <p>10 Q. And how old is she?</p> <p>11 A. Between 18 and 19.</p> <p>12 Q. Did you invite her to the event?</p> <p>13 A. Yes.</p> <p>14 Q. And next to her?</p> <p>15 A. I don't know his name. I</p> <p>16 forgot.</p> <p>17 Q. That's fine.</p> <p>18 And final, far right?</p> <p>19 A. Trevor. I forgot his last name.</p> <p>20 Q. Do you know how old he is?</p> <p>21 A. Between 18 and 19.</p> <p>22 Q. And did you invite him to the</p> <p>23 event?</p> <p>24 A. Yes.</p>
Page 31	Page 33
<p>1 Yes, I invited her.</p> <p>2 Q. And next to her, who is this?</p> <p>3 A. Mimi Sweeney.</p> <p>4 Q. And how old is she?</p> <p>5 A. 17.</p> <p>6 Q. And did you invite her to the</p> <p>7 event?</p> <p>8 A. Yes.</p> <p>9 Q. And next to her?</p> <p>10 A. Me.</p> <p>11 Q. All right. Left to right again</p> <p>12 on slide 11.</p> <p>13 All right. Far left?</p> <p>14 A. I forgot her name, but --</p> <p>15 Q. That's fine.</p> <p>16 Next to her?</p> <p>17 A. Khorey McDonald.</p> <p>18 Q. And how old was he?</p> <p>19 A. Between 19 and 20.</p> <p>20 Q. And did you invite him to the</p> <p>21 event?</p> <p>22 A. Yes.</p> <p>23 Q. Next to him?</p> <p>24 A. Me.</p>	<p>1 Q. Okay. We're on slide 12.</p> <p>2 So, far left?</p> <p>3 A. Here (indicating)?</p> <p>4 Q. Yes.</p> <p>5 A. Arianna. I forgot her last</p> <p>6 name.</p> <p>7 Q. Do you remember how old she is?</p> <p>8 A. 17.</p> <p>9 Q. Did you invite her to the event?</p> <p>10 A. Yes.</p> <p>11 Q. And next to her we have?</p> <p>12 A. Bianca Pohlak.</p> <p>13 Q. And how old was she?</p> <p>14 A. Between 18 and 19.</p> <p>15 Q. And did you invite her to the</p> <p>16 event?</p> <p>17 A. Yes.</p> <p>18 Q. Next to her we have?</p> <p>19 A. Milah Pohlak, her sister.</p> <p>20 Q. Do you remember how old she was?</p> <p>21 A. 17.</p> <p>22 Q. And did you invite her to the</p> <p>23 event?</p> <p>24 A. Yeah.</p>

Camesheann Tabitha Wakefield

Page 34	Page 36
<p>1 Q. Next to her covering his face?</p> <p>2 A. I can't remember who it is.</p> <p>3 Q. No worries.</p> <p>4 A. Yeah.</p> <p>5 Q. We're on slide 13.</p> <p>6 Far left, first visible?</p> <p>7 A. Me.</p> <p>8 Q. Next to you, or kind of in front</p> <p>9 of you?</p> <p>10 A. Marielle.</p> <p>11 Q. And what's her last name?</p> <p>12 A. Koladyzn.</p> <p>13 Q. How old is she?</p> <p>14 A. Between 18 and 19.</p> <p>15 Q. Did you invite her to the event?</p> <p>16 A. Yes.</p> <p>17 Q. Then next to her we have?</p> <p>18 A. Mimi.</p> <p>19 Q. And next to her we have?</p> <p>20 A. Lucy.</p> <p>21 Q. How about slide 14, please?</p> <p>22 Beginning on the far left, who is that?</p> <p>23 A. Charlotte Pierce.</p> <p>24 Q. How old is she?</p>	<p>1 Q. On the far left, who is this?</p> <p>2 A. Mimi.</p> <p>3 Q. In the middle?</p> <p>4 A. Lucy.</p> <p>5 Q. And the far right?</p> <p>6 A. Tallulah.</p> <p>7 Q. Slide 18. Again we've</p> <p>8 identified these people, but we're just</p> <p>9 going to go through it for record</p> <p>10 purposes.</p> <p>11 On the far left, who is that?</p> <p>12 A. Zoë.</p> <p>13 Q. On the far right?</p> <p>14 A. Jamie.</p> <p>15 Q. Slide 19.</p> <p>16 A. I don't know these people.</p> <p>17 Q. Okay. We'll move on.</p> <p>18 Slide 20. Hold up that to the</p> <p>19 camera for me.</p> <p>20 (Pause.)</p> <p>21 Q. Thank you.</p> <p>22 Who is this?</p> <p>23 A. Mimi.</p> <p>24 Q. Slide 21, hold that up for me.</p>
Page 35	Page 37
<p>1 A. Between 18 and 19.</p> <p>2 Q. Did you invite her to the event?</p> <p>3 A. Yes.</p> <p>4 Q. In the middle we have?</p> <p>5 A. Tino.</p> <p>6 Q. And to the far right we have?</p> <p>7 A. Allie.</p> <p>8 Q. We're going to hold up slide 15.</p> <p>9 (Pause.)</p> <p>10 Q. These are people previously</p> <p>11 identified, but we're going to run through</p> <p>12 it again.</p> <p>13 To the left kind of in the back?</p> <p>14 A. That's Zoë.</p> <p>15 Q. And to her left?</p> <p>16 A. Is Tino.</p> <p>17 Q. Both your invitees?</p> <p>18 A. Yes.</p> <p>19 Q. Slide 16, are you familiar with</p> <p>20 these individuals?</p> <p>21 A. No.</p> <p>22 Q. Moving on to slide 17, if you</p> <p>23 can show that to the court reporter.</p> <p>24 (Pause.)</p>	<p>1 (Pause.)</p> <p>2 Q. Who are these individuals?</p> <p>3 A. From the left it's, I guess,</p> <p>4 Trevor, Sam, Zoë, Allie, and Charlotte.</p> <p>5 Q. And then Trevor would be</p> <p>6 standing kind of half cut off?</p> <p>7 A. Mm-hm.</p> <p>8 Q. Sam would be sitting at that</p> <p>9 table?</p> <p>10 A. Yeah.</p> <p>11 Zoë's drinking, taking a sip of</p> <p>12 a drink.</p> <p>13 Q. And then that would be Allie</p> <p>14 standing to the left?</p> <p>15 A. Yes.</p> <p>16 Q. And then Charlotte standing to</p> <p>17 the right?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Thank you for going</p> <p>20 through that.</p> <p>21 After the party was over, did</p> <p>22 you post about the event on social media</p> <p>23 after the party or during the party?</p> <p>24 A. After -- well, you -- after,</p>

Camesheann Tabitha Wakefield

Page 38	Page 40
<p>1 yeah.</p> <p>2 Q. You posted pictures, something</p> <p>3 like that?</p> <p>4 A. Yeah.</p> <p>5 Q. And did your friends post about</p> <p>6 it on social media?</p> <p>7 A. Most likely, yeah.</p> <p>8 Q. After the event, did you start</p> <p>9 using Juul regularly?</p> <p>10 A. Yeah.</p> <p>11 Q. And what flavors did you prefer</p> <p>12 to use?</p> <p>13 A. Mint and tobacco and then later</p> <p>14 on mango.</p> <p>15 Q. When did the first people in,</p> <p>16 like, your peer group hear of Juul?</p> <p>17 A. Yeah, I think this day.</p> <p>18 Q. And did people ask you about</p> <p>19 your Juul device?</p> <p>20 A. Yeah.</p> <p>21 Q. So, when you were having, kind</p> <p>22 of, conversations with people, did you</p> <p>23 tell people about it?</p> <p>24 A. Yes.</p>	<p>1 with you?</p> <p>2 A. I took a -- after that I took a</p> <p>3 leave for a year and I was still in New</p> <p>4 York, but I was -- I wasn't in college. I</p> <p>5 went upstate to, like, start my first</p> <p>6 studio. So I brought it to another</p> <p>7 college.</p> <p>8 Q. Okay.</p> <p>9 A. SUNY Purchase.</p> <p>10 Q. And at SUNY Purchase, would you</p> <p>11 have been one of the first people to have</p> <p>12 a Juul?</p> <p>13 A. Yeah.</p> <p>14 Q. And did it spread there?</p> <p>15 A. Yeah. It spread it in New York,</p> <p>16 there. Like it just was, like, started</p> <p>17 going crazy.</p> <p>18 Q. Do you still smoke Juuls or</p> <p>19 other tobacco products, or did it become a</p> <p>20 habit for you to smoke tobacco?</p> <p>21 A. Yes.</p> <p>22 Q. And was that a pretty regular</p> <p>23 habit?</p> <p>24 A. Like after?</p>
Page 39	Page 41
<p>1 Q. And would you say it spread,</p> <p>2 caught on?</p> <p>3 A. Yes.</p> <p>4 Q. You're laughing.</p> <p>5 Did it catch on in a big way?</p> <p>6 A. Yeah.</p> <p>7 Q. So it became quite popular in</p> <p>8 your peer group?</p> <p>9 A. Very.</p> <p>10 Q. And the same thing probably with</p> <p>11 your friends who went to the party, they</p> <p>12 probably talked about it with people?</p> <p>13 A. Yeah.</p> <p>14 Q. And then it would have gotten</p> <p>15 bigger from there, would you say?</p> <p>16 A. Yeah.</p> <p>17 Q. Did you bring your Juul --</p> <p>18 MS. DAVIS: Sorry. Strike that.</p> <p>19 Q. At the time of the party, you</p> <p>20 were coming off your freshman year of</p> <p>21 college, if my math's right?</p> <p>22 A. Yes.</p> <p>23 Q. Did you bring the device and the</p> <p>24 free pods they gave you back to college</p>	<p>1 Q. Yes.</p> <p>2 A. Yeah.</p> <p>3 Q. And would you say you now have a</p> <p>4 habit of smoking tobacco products that you</p> <p>5 did not have before the launch party?</p> <p>6 A. Yes. I don't like to admit it,</p> <p>7 but yes, of course.</p> <p>8 Q. Is Juuling and vaping, is that</p> <p>9 still popular in your friend group, peer</p> <p>10 group today?</p> <p>11 A. Like, it's honestly gotten to a</p> <p>12 crazier point than it ever has. It's</p> <p>13 intense.</p> <p>14 Q. It's intense?</p> <p>15 A. Yeah.</p> <p>16 MS. DAVIS: I'd like to go off</p> <p>17 the record for a second so I can check</p> <p>18 my notes to see if there are any other</p> <p>19 questions we need to get into.</p> <p>20 (Recess taken.)</p> <p>21 BY MS. DAVIS:</p> <p>22 Q. When Douglas Perrett reached out</p> <p>23 to you to, kind of, help promote the</p> <p>24 event, was the goal -- when you were</p>

Camesheann Tabitha Wakefield

Page 42	Page 44
1 invited to the event, you were invited to	1 A C K N O W L E D G M E N T
2 be a promoter?	2
3 A. Yes.	3 STATE OF)
4 Q. And were you told to invite	4 :ss
5 people?	5 COUNTY OF)
6 A. Yes.	6
7 Q. And were you told to invite as	7 I, CAMESHEANN TABITHA WAKEFIELD,
8 many people as you wanted?	8 hereby certify that I have read the
9 A. Yes.	9 transcript of my testimony taken under
10 Q. So, the goal of you was to get	10 oath of my statement of January 20, 2022;
11 people there?	11 that the transcript is a true and complete
12 A. Yes.	12 record of my testimony, and that the
13 Q. Okay.	13 answers on the record as given by me are
14 A. That's how I ended up in all the	14 true and correct.
15 photos.	15
16 Q. Yes. And your friends as well?	16
17 A. Yeah. I'm like oh, you're here.	17
18 Hey.	18 CAMESHEANN TABITHA WAKEFIELD
19 MS. DAVIS: All right.	19 Signed and subscribed to before me this
20 Well, I think I'm going to call	20 _____ day of _____, 20__.
21 time here.	21
22 (Time noted: 2:51 p.m.)	22
23	23 Notary Public, State of
24	24

Page 43	Page 45
1 CERTIFICATION	1 E R R A T A
2 I, MARIE FOLEY, a Notary	2 PAGE / LINE / CHANGE / REASON
3 Public in and for the State of New York,	3
4 do hereby certify:	4
5 THAT the foregoing is a true	5
6 and accurate transcript of my stenographic	6
7 notes.	7
8 IN WITNESS WHEREOF, I have	8
9 hereunto set my hand this 24th of January,	9
10 2022.	10
11	11
12	12
13	13
14	14
15	15
16	16
17	17
18	18
19	19
20	20
21	21
22	22
23	23
24	24

A C K N O W L E D G M E N T

STATE OF New York)

: SS

COUNTY OF New York)

I, CAMESHEANN TABITHA WAKEFIELD,
hereby certify that I have read the
transcript of my testimony taken under
oath of my statement of January 20, 2022;
that the transcript is a true and complete
record of my testimony, and that the
answers on the record as given by me are
true and correct.



CAMESHEANN TABITHA WAKEFIELD

Signed and subscribed to before me this
10th day of February, 2022.



Notary Public, State of New York



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

CERTIFICATION

I, MARIE FOLEY, a Notary
Public in and for the State of New York,
do hereby certify:

THAT the foregoing is a true
and accurate transcript of my stenographic
notes.

IN WITNESS WHEREOF, I have
hereunto set my hand this 24th of January,
2022.

Marie Foley, RMR, CRR
MARIE FOLEY, RMR, CRR

1	E R R A T A			
2	PAGE / LINE / CHANGE	/ REASON		
3	Pg. 24 Ln. 21 / Tallulah Gilroy	Talulah Gilroy/ Misspelling		
4	Pg. 26 Ln. 21 / Tallulah Gilroy	Talulah Gilroy/ Misspelling		
5	Pg. 27 Ln. 24/ Christopher Topper	Christopher Tapper/ Misspelling		
6	Pg. 29 Ln. 7/ Tallulah	Talulah/ Misspelling		
7	Pg. 31 Ln. 17/ Khorey McDonald	Khorey MacDonald/ Misspelling		
8	Pg. 32 Ln. 2/ William Daniels	Liam Daniels/ Misspelling		
9	Pg. 32 Ln. 9/ Jamie Wu	Jamie Lui/ Misspelling		
10	Pg. 36 Ln. 6/ Tallulah	Talulah/ Misspelling		
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				